1 Vanessa R. Waldref United States Attorney Eastern District of Washington 3 Todd M. Swensen Assistant United States Attorney 402 E. Yakima Avenue, Suite 210 5 Yakima, Washington 98901 (509) 454-4425 6 7 IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WASHINGTON 8 9 UNITED STATES OF AMERICA, 1:23-CR-02036-MKD-1 10 Plaintiff, 11 UNITED STATES' SENTENCING 12 **MEMORANDUM** v. 13 RONALD LEE RALSTON, JR., 14 Defendant. 15 16 17 The United States of America, by and through Vanessa R. Waldref, 18 United States Attorney for the Eastern District of Washington, and Todd M. 19 Swensen, Assistant United States Attorney, submits the following United States' 20 21 Sentencing Memorandum: 22 I. **Offense Level & Criminal History:** 23 The United States concurs with the Presentence Investigation Report 24 25 (PSR) that the minimum term of imprisonment here is 10 years in accordance 26 with 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii) and 846. See ¶ 239. The United 27 28

UNITED STATES' SENT. MEMO.

States likewise concurs with the PSR with regards to the calculated base offense level of 38 and Total Offense Level calculation of 35. $See \ \P \ 42-51; 240$. The United States also concurs with Probation's assessment of Defendant's criminal history category of II. $See \ \P \ 259$.

II. Departures:

The United States has not identified any downward nor upward departures warranted under the Guidelines.

III. 18 U.S.C. § 3553(a):

The United States has no Section 3553(a) information beyond what is included in the PSR. The United States believes that guideline range detailed in the PSR is a sufficient sentence, but not greater than necessary to comply with the purposes of 18 U.S.C. § 3553.

Based on the information above, the United States will request a low-end of the Guidelines range sentence to be followed by 5 years of supervised release.

DATED this 12th day of February 2024.

VANESSA R. WALDREF United States Attorney

TODD M. SWENSEN

Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, and a copy was emailed to the counsel of record in this case: Ulvar Klein.

Todd M. Swensen

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